

1 DANIEL G. BOGDEN
United States Attorney
2 District of Nevada
KIMBERLY M. FRAYN
3 Assistant United States Attorney
333 Las Vegas Blvd. South
4 Suite 5000
Las Vegas, Nevada 89101
5 Telephone: (702) 388-6336
Fax: (702) 388-6418

6 Attorneys for the Government
7
8
9

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA
12

13 -oOo-

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.

17 MICHAEL LOFTON,

18 Defendant.
19 _____

2:12-MJ-0138-PAL-PAL

MOTION TO DISMISS
CRIMINAL COMPLAINT

20 The United States of America by Daniel G. Bogden, United States Attorney for
21 the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, requests
22 pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, that the Court enter an
23 order allowing the government to dismiss without prejudice the charges brought against
24
25
26

1 defendant **MICHAEL LOFTON** which are contained in Criminal Complaint 2:12-MJ-0138-
2 PAL-PAL. Instead, the government will proceed against defendant MICHAEL LOFTON on
3 the charges brought by Indictment in 2:12-CR-0004-JCM-GWF.

4
5 DATED this _21st__ day of March, 2012.

6
7 Respectfully submitted,

8 DANIEL G. BOGDEN
9 United States Attorney

10 /s/ Kimberly M. Frayn
11 KIMBERLY M. FRAYN
12 Assistant United States Attorney

13 Certificate of Service

14 I, Kimberly M. Frayn, do hereby certify that I am an employee of the Organized
15 Crime Strike Force, United States Attorney's Office, District of Nevada, and that on February
16 17, 2012, I served a copy of the following:

17 MOTION TO DISMISS CRIMINAL COMPLAINT and proposed ORDER OF DISMISSAL
18 upon the defendant's counsel of record by electronic means through ECEMF

19 DATED: March 21, 2012

20 /s/Kimberly M. Frayn
21 KIMBERLY M. FRAYN
22 Assistant United States Attorney

1
2 UNITED STATES DISTRICT COURT
3 DISTRICT OF NEVADA
4

5 -oOo-

6 UNITED STATES OF AMERICA,

7 Plaintiff,

8 v.

9 MICHAEL LOFTON,

10 Defendant.
11 _____

2:12-MJ-0138-PAL-PAL

ORDER FOR DISMISSAL

12 Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, and upon
13 leave of Court, the United States Attorney for the District of Nevada hereby dismisses
14 without prejudice the charges brought against defendant **MICHAEL LOFTON** that are
15 contained the above-captioned Criminal Complaint.
16

17 Respectfully submitted,

18 DANIEL G. BOGDEN
19 United States Attorney

20 /s/ Kimberly M. Frayn _____
21 KIMBERLY M. FRAYN
Assistant United States Attorney

22 Leave of Court is granted for the filing of the foregoing dismissal.

23 DATED this 9th day of March 2012
24

25 
26 HONORABLE PEGGY A. LEEN
UNITED STATES MAGISTRATE COURT JUDGE